

1 Sonal N. Mehta (SBN 222086)
sonal.mehta@wilmerhale.com
2 WILMER CUTLER PICKERING
3 HALE AND DORR LLP
2600 El Camino Real, Suite 400
4 Palo Alto, CA 94306
Telephone: (650) 858-6000
5 Facsimile: (650) 858-6100

6 Joseph Taylor Gooch (SBN 294282)
taylor.gooch@wilmerhale.com
7 WILMER CUTLER PICKERING
8 HALE AND DORR LLP
50 California Street, Suite 3600
9 San Francisco, CA 94111
Telephone: (628) 235-1002
10 Facsimile: (628) 235-1001

11 *Attorneys for Non-Party*
12 *Netflix, Inc.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA,**
15 **SAN FRANCISCO DIVISION**

16 LYNWOOD INVESTMENTS CY LIMITED,
17 Plaintiff,

18 v.

19 MAXIM KONOVALOV, IGOR SYSOEV,
ANDREY ALEXEEV, MAXIM DOUNIN, GLEB
SMIRNOFF, ANGUS ROBERTSON, NGINX,
20 INC. (BVI), NGINX SOFTWARE, INC., NGINX,
INC. (DE), BV NGINX, LLC, RUNA CAPITAL,
21 Inc., EVENTURE CAPITAL PARTNERS II, LLC
and F5 NETWORKS, INC.,

22 Defendants.

Case No. 3:20-cv-03778-MMC (KAW)

**[PROPOSED ORDER] REGARDING
PLAINTIFF'S MOTION TO
COMPEL**

1 Plaintiff Lynwood Investments CY, Limited (“Lynwood”)’s motion to compel non-party
2 Netflix’s, Inc. (“Netflix”) to produce documents and information pursuant to Lynwood’s June
3 10, 2025 subpoena came before this Court on October 16, 2025.

4 Having considered Lynwood’s Motion, Netflix’s Opposition, Lynwood’s Reply and oral
5 argument presented to this Court in support of Lynwood’s and Netflix’s respective positions on
6 the Motion to Compel on October 16, 2025:

7
8 **IT IS ORDERED** that Lynwood’s Motion to Compel is **DENIED, WITHOUT**
9 **PREJUDICE**. Netflix and Lynwood are **FURTHER ORDERED** to meet and confer regarding
10 Lynwood’s attempts to collect responsive documents from the Parties, only once Lynwood has
11 ascertained what documents it can, with diligence, reasonably expect to receive from
12 Defendants, and has determined what additional information it believes it can only collect from
13 Netflix.

14
15 **SO ORDERED.**

16
17 Dated: _____

18
19 _____
Hon. Kandis Westmore
U.S. Magistrate Judge

20
21 **[IN THE ALTERNATIVE]**

22
23 **IT IS ORDERED** that Lynwood’s Motion to Compel is **GRANTED-IN-PART** and
24 **DENIED-IN PART, WITHOUT PREJUDICE**. Netflix is **ORDERED** to produce relevant,
25 non-privileged email communications in its custody and control between Netflix on one hand
26 and Maxim Konovalov, Igor Sysoev, Andrey Alexeev, Maxim Dounin, Gleb Smirnoff, or Agnus
27 Robertson on the other, between January 1, 2008 and December 31, 2011. Netflix and Lynwood
28 are **FURTHER ORDERED** to meet and confer regarding Lynwood’s attempts to collect

responsive documents from the Parties, only once Lynwood has ascertained what documents it can, with diligence, reasonably expect to receive from Defendants, and has determined what additional information it believes it can only collect from Netflix.

SO ORDERED.

Dated: _____

Hon. Kandis Westmore
U.S. Magistrate Judge